

**DIVISION OF ENVIRONMENTAL HEALTH  
SOLID WASTE PROGRAM  
610 UNIVERSITY AVENUE  
FAIRBANKS, AK 99709-3643**  
<http://www.state.ak.us/dec/home.htm>

**Telephone: (907) 451-2108  
Fax: (907) 451-2187**

**File Number: 107.15.001**

January 31, 2002

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED # 7099 3400 0015 5441 3315**

Lt. Colonel Michael K. Myers  
354 CES/CC, U.S. Department of the Air Force  
2258 Central Ave. Suite 100  
Eielson AFB, AK 99702-2299

Re: Eielson AFB Asbestos and Inert Waste Landfill, Solid Waste  
Permit # 0231-BA001, Renewal of Permit #9731-BA001

Dear Lt. Colonel Myers:

The Department of Environmental Conservation has completed its evaluation of your Class I Solid Waste Disposal Permit renewal application for the Eielson AFB Asbestos and Inert Waste Landfill, located in Section 13, T.3S, R.3E, Fairbanks Meridian, and is issuing the permit in accordance with AS 46, 18 AAC 15, and 18 AAC 60. Please review the conditions and stipulations in the permit and ensure they are all understood. This permit is effective upon issuance and expires **January 15, 2007**.

Any person who disagrees with this decision may appeal the decision by requesting an adjudicatory hearing, using the procedures contained in 18 AAC 15.200-310. Hearing requests must be delivered to the Commissioner of the Department of Environmental Conservation, 555 Cordova Street, Anchorage AK 99501, within 30 days of receipt of this letter. If a hearing is not requested within 30 days, the right to appeal is waived. Even if an adjudicatory hearing has been requested and granted, all permit conditions remain in full force and effect. Please also send a copy of the request to the undersigned.

Sincerely,

Nancy B. Sonafrank for  
Heather T. Stockard  
Solid Waste Program Manager

SKM\ XD (EH/SW/FBKS - \\FBX-FILE\GROUPS\EH\SW\2002\0231-BA001 EAFB Asbestos.doc)

Enclosure: Permit #0231-BA001

Cc w/encl.: Alan Simmons, 354 CES/CEVC  
Trustees for Alaska/Anchorage

Lt. Colonel Michael Myers

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January 31, 2002

Bcc w/encl.: Heather Stockard/ADEC-Juneau

**ALASKA DEPARTMENT  
OF  
ENVIRONMENTAL CONSERVATION  
DIVISION OF ENVIRONMENTAL HEALTH  
610 UNIVERSITY AVENUE  
FAIRBANKS, ALASKA 99709-3643**

**SOLID WASTE DISPOSAL PERMIT**

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Permit: **0231-BA001**

Date: January 31, 2002

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This Solid Waste Disposal Permit is issued to the 354 CES/CC, U.S. Department of the Air Force, 2258 Central Ave., Suite 100, Eielson AFB, AK 99702-2299, for the operation and maintenance of an asbestos and inert waste landfill at Eielson AFB, located in Section 13, T.3S, R.3E, Fairbanks Meridian. This permit is subject to the conditions and stipulations contained in the following Appendices:

Appendix A	Specific Conditions.....	Page 2
Appendix B	General Permit Conditions.....	Page 7
Appendix C	Asbestos Requirements .....	Page 9

This permit is issued under the provisions of Alaska Statute 46.03 and the Alaska Administrative Code, as amended or revised, and other applicable state laws and regulations.

This permit is effective upon issuance and expires January 15, 2007. It may be terminated or modified in accordance with AS 46.03.120.

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Nancy B. Sonafrank for  
Heather T. Stockard  
Solid Waste Program Manager

## **APPENDIX A – SITE DEVELOPMENT AND OPERATIONS**

### **I. SITE DEVELOPMENT**

The permit holder shall:

- A. Comply with the designs and plans in the permit renewal application dated December 28, 2001 which includes the Operations and Maintenance Plan, the Monitoring Plan, and the Closure Plan. The permittee must comply with the following permit conditions. Additional modifications may be requested by the permittee, but must be authorized by a permit amendment, before that modification is effective.
- B. Ensure that all operations will accommodate the waste volume and are done in a manner that will facilitate close out upon closure.
- C. Maintain fencing and a locking gate at the site entrance to control public access to the site.
- D. Maintain permanent markers, such as surveying bench marks, from which the exact location of the facility and each closed portion can be determined.
- E. Maintain a minimum separation distance of 50 feet between the active placement of solid waste and the facility boundary.
- F. Ensure that the surface water runoff from outside of the facility does not flow over, into, or through uncovered or covered solid waste by constructing and maintaining, as needed, diversion structures such as berms or ditches at the facility.
- G. Erect and maintain the following signs:
  - 1. Erect and maintain a readily visible sign at the facility with the following information legibly printed:

**Facility Identification**  
**Owner/Operator Name**  
**Hours of Operation**  
**Conditions for Use**  
**Emergency Phone Numbers**

- 2. Erect and maintain readily visible signs in the facility which will easily direct users to specific waste handling areas, and display pertinent rules.



## II. SITE OPERATION

The permit holder shall:

### A. General Operating Procedures

1. Ensure that only asbestos and coal ashes from known and tested sources are disposed of at the facility. Putrescible wastes may not be disposed of at this site. Disposal requirements for asbestos are included in Appendix C.
2. Ensure that public access to the facility is controlled to reduce risks to health and to reduce safety hazards. Prohibit uncontrolled scavenging and salvaging by the public.
3. Ensure that dust, odor, noise, traffic, and other effects from the operation of the facility do not become a nuisance or hazard to the health, safety, or property of persons outside the landfill boundary.
4. Ensure wildlife and domestic animals are not allowed access to the disposal area and that the site be maintained to prevent being an attraction to them.
5. Report all spills or discharges of hazardous substances which occur at the landfill facility as described in 18 AAC 75, Article 3, or as revised or amended.
6. Ensure that refuse is deposited in approved locations only. Dumping in unauthorized areas violates conditions of this permit and Alaska Administrative Codes.

### B. Burial

1. Consolidate and cover all deposited waste with a minimum of 6 inches of soil by the end of each operating day. Increase cover frequency if necessary to accommodate disposal volume increases or to control nuisances, animal attraction, or blowing litter.
2. Ensure that total horizontal width of the working face does not exceed 40 linear feet. Ensure that the maximum height for refuse is maintained at or below 8 feet.
3. Ensure that solid wastes are not placed in surface waters.
4. Apply a final cover as specified in the Closure Section of this permit.

### C. Burning

1. Prohibit all open burning within the active portion of the facility.
2. Notify the Department of Environmental Conservation, Solid Waste Program, Fairbanks Office at 451-2108, as soon as possible if any fires occur at the landfill. Ensure that appropriate and immediate actions are taken to extinguish any fires that occur.

## II. SITE OPERATION (cont.)

### D. Litter

1. Collect all windblown and littered refuse from the disposal site and along the entrance road at least once each week and return it to the active disposal trench for burial. All littered wastes on lands within 500 feet of the site, whether windblown or dumped, shall be collected and disposed of at a frequency necessary to prevent this litter from becoming an aesthetic nuisance.

## III. PROHIBITIONS AND SPECIAL RESTRICTIONS

- A. Prohibit discharge of firearms at the facility.
- B. Prohibit uncontrolled scavenging and salvaging by the public.
- C. Prohibit disposal of hazardous wastes, as defined by 40 CFR Part 261. Ensure that waste meeting this definition is disposed of in accordance with 40 CFR Part 262, Standards Applicable to Generators of Hazardous Waste.
- D. Prohibit disposal of lead-acid vehicle batteries in the landfill. Storage in a designated area in closed, leak-proof containers prior to transport to an acceptable recycle or disposal site is permitted.
- E. Prohibit the disposal of polluted soil as defined by 18 AAC 60.025 & 330. Disposal of polluted soils will be considered a change in operations and will require an amendment to this permit in accordance with 18 AAC 15.100.
- F. Prohibit the disposal of coal ash that exhibits any of the characteristics of toxicity (TCLP).
- G. Prohibit disposal of putrescible wastes.

## IV. MONITORING AND REPORTING

The permit holder shall:

- A. Visually monitors the site each month for signs of damage or potential damage from settlement, ponding, leakage, erosion, or operations at the site. Record the inspection results and maintain them in the facility's operating record for review by Department staff during inspections.
- B. Maintain a set of site development and use plans and submit an updated copy to the Department showing current status before January 31<sup>st</sup> of each year.

IV. MONITORING AND REPORTING (cont.)

- C. Maintain an inventory of ash being disposed of, including source, amount, and results of any TCLP analyses done on the ash in the operating record for the facility. If source or composition of fuel changes during permit duration, additional testing will be required and should be submitted to the Department within 90 days.

V. RECORD KEEPING REQUIREMENTS

- A. Maintain a copy of the following records listed in Table A in the facility's operating record. The records shall be made available to Department staff for review during facility inspections.

**Table A.**

<b>RECORD KEEPING REQUIREMENTS</b>	<b>REGULATION CITATION:</b>
Permit application or permit	18 AAC 60.210
Solid Waste Management Plan	18 AAC 60.205
Operations & Maintenance Manual	18 AAC 60.210(b)(9)
Visual Inspections Records	18 AAC 60.210(b)(13)
Closure & post-closure plans & post-closure notation to deed (if applicable)	18 AAC 60.450 & 490
Current site plan & cross sectional drawings of the landfill	18 AAC 60.210(b)(6)



## VI. CLOSURE AND RESTORATION

The permit holder shall:

- A. Notify the Solid Waste Program, Fairbanks ADEC Office at least 30 days before the site is to be permanently closed and the equipment withdrawn.
- B. Ensure that closure activities are conducted in accordance with the Closure Plan dated December 28, 2002. Closure requirements for asbestos are included in Appendix C.
- C. Ensure that an intermediate cover of at least 6 inches of additional soil is applied over the existing 6-inch daily cover resulting in soil cover of 12 to 18 inches in inactive areas of the landfill that are at closure grade but have not received final cover. Grade and maintain the intermediate cover to promote surface water runoff without erosion.
- D. Ensure that a final cover be applied within 90 days after the last waste is deposited and consists of at least two feet of soil, the top 6 inches of which will promote adequate water retention for the successful revegetation of the site with native vegetation.
- E. Grade the completed landfill areas to promote surface water runoff without erosion. Surface restoration and erosion control work, such as grading and contouring, will be completed within 90 days after site closure. Restoration will be required if the Department determines that significant erosion has occurred within 5 years of facility closure.
- F. Develop and implement a vegetative cover plan for completed areas within the first growing season using plant species recommended by the Alaska Plant Material Center (907) 745-4469.
- G. Prepare a survey as-built or updated facility record drawings showing the location of the facility and the waste cell(s) within the property boundary and waste cell dimensions, including the estimated depth of buried waste, the total waste volume, and type of waste deposited at the solid waste disposal site, within 60 days of the final closure or expiration date of this permit.
- H. Record the survey as-built or updated facility record drawings at the State Recorder's Office or other appropriate land records office approved by the Department, along with a plat note or other file notation informing future property owners that use of the land must not result in the disturbance of the integrity of the final cover, cap, or other structures or devices installed as part of the landfill closure, unless approved by the Department. Submit a copy of the survey as-built or record drawings and proof of the land record recordings within 60 days of the recording to the ADEC Solid Waste Program, Fairbanks Office.

## **APPENDIX B - GENERAL PERMIT CONDITIONS**

### **I. ACCESS AND INSPECTION**

The permittee shall allow the Commissioner or his/her representative access to the permitted facilities at reasonable times to conduct scheduled or unscheduled inspections or tests to determine compliance with this permit, State laws, and regulations.

### **II. INFORMATION ACCESS**

Except for information relating to confidential processes or methods of manufacture, all records and reports submitted in accordance with the terms of this permit shall be available for public inspection at the State of Alaska Department of Environmental Conservation, Fairbanks Office, 610 University Avenue, Fairbanks, Alaska 99709-3643.

### **III. CIVIL AND CRIMINAL LIABILITY**

Nothing in this permit shall relieve the permittee from civil or criminal penalties for noncompliance, whether or not such noncompliance is due to factors beyond his control, including, but not limited to, accidents, equipment breakdowns, or labor disputes.

### **IV. AVAILABILITY**

The permittee shall post or maintain a copy of this permit available to the public at the disposal facility.

### **V. ADVERSE IMPACT**

The permittee shall take all necessary means to minimize any adverse impacts to the receiving waters or lands resulting from noncompliance with any limitation specified in this permit, including any additional monitoring needed to determine the nature and impact of the noncomplying activity. The permittee shall cleanup and restore all areas adversely impacted by the noncompliance.

### **VI. CULTURAL OR PALEONTOLOGICAL RESOURCES**

Should cultural or paleontological resources be discovered as a result of this activity, work which would disturb such resources is to be stopped, and the State Historic Preservation Office, Division of Parks and Outdoor Recreation, Department of Natural Resources, is to be notified immediately (907-269-8721).

### **VII. APPLICATIONS FOR RENEWAL**

In accordance with 18 AAC 15.100(d), applications for renewal or amendment of this permit must be made no later than 30 days before the expiration date of the permit or the planned effective date of the amendment.



#### VIII. OTHER LEGAL OBLIGATIONS

The requirements, duties, and obligations set forth in this permit are in addition to any requirements, duties, or obligations contained in any permit that the Alaska Department of Environmental Conservation or the U.S. Environmental Protection Agency has issued or may issue to the permittee. This permit does not relieve the permittee from the duty to obtain any and all necessary permits and to comply with the requirements contained in any such permit or with applicable state and federal laws and regulations. All activities conducted by the permittee pursuant to the terms of this permit and all plans implemented by the permittee pursuant to the terms of this permit shall comply with all applicable state and federal laws and regulations.

#### IX. POLLUTION PREVENTION

In order to prevent and minimize present and future pollution, when making management decisions that affect waste generation, the permittee shall consider the following order of priority options: waste source reduction; recycling of waste; waste treatment; and waste disposal.

## **APPENDIX C -ASBESTOS DISPOSAL CONDITIONS**

### **I. SITE PREPARATION**

The permit holder shall:

- A. Designate and maintain a separate area within the permitted landfill for regulated asbestos containing material (RACM) waste disposal.
- B. Ensure the waste management area used for disposal of RACM waste is located on undisturbed earth or stable fill. It must not be located in an area that would preclude future closeout or remedial action at the facility.
- C. Install fencing, berms, trenches, or other barriers appropriate to the location of the landfill to control access to the designated asbestos disposal area.
- D. Post signs at the asbestos site entrance and at 100 foot intervals or less along the asbestos site boundary that state in one-inch or taller lettering:

**ASBESTOS WASTE DISPOSAL SITE  
DO NOT CREATE DUST  
BREATHING ASBESTOS  
IS HAZARDOUS TO YOUR HEALTH**

Signs may be removed after the final cover has been applied, however, a permanent monument indicating that asbestos is buried below must be maintained.

### **II. RECEIVING ASBESTOS WASTE**

The permit holder shall:

- A. Ensure the permittee or designated representative is present at the site to supervise the disposal. The landfill operator must maintain a log of the source and quantity of asbestos delivered. Landfill operators may require the driver to sign in or sign over a chain-of-custody or waste manifest form. The facility owner must maintain shipping manifests and all other records pertaining to the asbestos waste.
- B. Inspect loads to verify that RACM waste is properly contained in leak-tight containers and labeled appropriately. A complete and accurate shipment record shall accompany the loads. The operator should contact the Alaska Department of Environmental Conservation (907-451-2108) and the U.S. Environmental Protection Agency (206-553-1757 or 907-269-4954) if the waste is improperly packaged.
- C. Ensure RACM asbestos waste is thoroughly wetted and placed in a leak-tight container before burial. Containers may be barrels, drums, or double six-mil or thicker plastic bags.

II. RECEIVING ASBESTOS WASTE (cont.)

D. Ensure all RACM containers shall have a warning label attached that states:

**CAUTION  
CONTAINS ASBESTOS  
AVOID OPENING OR BREAKING CONTAINER  
BREATHING ASBESTOS IS HAZARDOUS TO YOUR HEALTH  
or:  
CAUTION  
CONTAINS ASBESTOS  
AVOID OPENING OR BREAKING CONTAINER  
BREATHING ASBESTOS DUST  
MAY CAUSE SERIOUS BODILY HARM**

III. WASTE DEPOSITION AND COVERING

The permit holder shall:

- A. Ensure non-regulated asbestos containing material waste (non-RACM waste) is buried in a manner that does not result in the release of asbestos fibers to the air or surface water. Non-RACM waste must be covered with six inches of clean soil within 24 hours after its placement in the disposal area. Regulations do not require non-RACM waste to be packaged or labeled, but in some cases, packaging may be appropriate to prevent the release of asbestos dust. The generation of asbestos dust from non-friable (non-RACM) asbestos is a violation of NESHAP. The disposal of non-RACM waste may occur only in permitted landfills which have had no fires occurring in them for more than one year.
- B. Place RACM waste into the disposal cell carefully to avoid breaking the material or containers. Particular care must be taken with plastic bags since they may break under pressure and emit asbestos particles.
- C. Cover the waste and container with at least six inches of non-asbestos containing soil material or coal ash by the end of each day of waste deposition.

IV. SITE CLOSURE

The permit holder shall:

- A. Construct permanent survey markers at the site.
- B. Ensure final cover of at least two (2) feet is applied within 90 days of the last deposition to areas that will not receive more waste within one year. Additional cover may be required in

areas subject to excessive soil erosion or frost action.

IV. SITE CLOSURE (Cont.)

- C. Maintain the integrity of the soil cover slopes, vegetation, and drainage structures of closed asbestos waste disposal sites.
- D. Mark the limits of the asbestos disposal area on property survey records.
- E. Record that asbestos disposal has occurred at the site on the property deed, with a written warning about health and safety hazards related to disturbing the site. Provide proof to the Department that this record had been placed on the property deed.

V. REPORTING

The permit holder shall:

- A. Retain all records regarding RACM waste accepted at the site for at least two years after site closure. Records shall be furnished to the Department upon request.
- B. Maintain an exact description of the location (maps or diagrams) with reference to a permanent marker or survey post, showing the depth of the waste area, and the amount, in cubic yards of RACM waste accepted. This information shall be kept in the facility operating record, until landfill closure is complete.
- C. Prepare and annually update as-built or record drawing showing the location and volume of waste deposited at the asbestos waste disposal site and file those drawings with the Department annually and when the site is closed.
- D. Provide a record to subsequent landowners that asbestos waste has been buried on the property and that it would be hazardous to attempt to excavate that area. The location of the asbestos deposit should be conveyed in the land title or deed document.